

FILED
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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS P 3:43

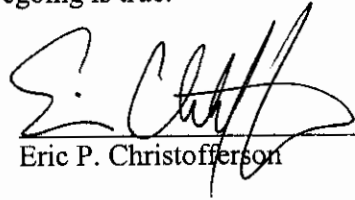
IN RE PHARMACEUTICAL INDUSTRY)	U.S. DISTRICT COURT
AVERAGE WHOLESALE PRICE)	DISTRICT OF MASS.
LITIGATION)	MDL No. 1456
)	
)	Civil Action No. 01-12257-PBS
)	
THIS DOCUMENT RELATES TO:)	Judge Patti B. Saris
ALL CLASS ACTIONS)	
)	
)	
)	

DECLARATION OF ERIC P. CHRISTOFFERSON

I, ERIC P. CHRISTOFFERSON, hereby declare:

1. I am associated with Ropes & Gray LLP and represent Schering-Plough Corporation ("Schering") and Warrick Pharmaceuticals Corporation ("Warrick") in this litigation. I have personal knowledge of the facts contained herein and offer this declaration in support of Defendants' Motion To Compel Production Of Documents From Plaintiff Blue Cross Blue Shield Of Massachusetts. If called to testify, I could testify competently as to the matters set forth herein.
2. In order to respond to Plaintiffs' discovery requests in this litigation, Schering and Warrick hired sixty (60) contract attorneys, in addition to full-time attorneys, to review documents prior to production.
3. Schering and Warrick reviewed and produced millions of pages of documents in response to discovery requests in this litigation.

I declare under penalty of perjury that the foregoing is true.



Eric P. Christofferson

EXECUTED this 20th day of March, 2006 in Boston, Massachusetts.